

HULL

Environment / Energy / Infrastructure

former GM Linden

NJD 002186698

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March 6, 2018

Mr. Gary Greulich
New Jersey Department of Environmental Protection
Northern Regional Office
7 Ridgedale Avenue
Cedar Knolls, NJ 07927

RE: Remedial Action Progress Report No. 26 for the Industrial #2 Redevelopment Area Portion of the Former General Motors (GM) Linden Assembly Plant, 1016 West Edgar Road, Linden, Union County, New Jersey 07036; DUK059.0240.

Dear Mr. Greulich:

On June 3, 2011, the New Jersey Department of Environmental Protection (NJDEP) approved the New Jersey Remedial Action Work Plan and RCRA Corrective Measures Proposal Addendum No. 4 (RAWP) for the Industrial #2 Redevelopment Area of the Former GM Linden Assembly Plant (Site; SRP PI# 621084; Case Tracking Number: E20040531-Industrial). The June 3, 2011 approval letter requested a Remedial Action Progress Report for the Industrial #2 Redevelopment Area on/by September 30, 2011. Subsequent reports will be submitted on a quarterly basis.

As discussed during extensive correspondence with NJDEP, the industrial portion of the Former GM Plant, which includes the Industrial #1 and Industrial #2 Redevelopment Areas, was sold in late-2013 by Linden Development LLC to Duke Linden LLC (Duke Linden). Duke Realty Corporation is a primary member of both the former owner (Linden Development LLC) and new owner (Duke Linden) and will provide for consistent implementation of the previously-approved remedial strategy outlined in RAWP Addendum No. 4. The project team has remained unchanged since the last progress report.

As part of the property transaction, NJDEP assigned the following updated identification numbers for the industrial portion of the Former GM Plant which includes the Industrial #2 Redevelopment Area:

- Program Interest Number: 621084
- Case Tracking Number: E20040531-Industrial

This letter constitutes Remedial Action Progress Report No. 26 for the Industrial #2 Redevelopment Area. Hull & Associates, Inc. (Hull) has prepared this report on behalf of Duke Linden to summarize remedial activities completed on the Site between October 1, 2017 and February 28, 2018.

Requirements, according to N.J.A.C. 7:26E-6.6, are shown below in ***bold italics***, with Hull/Duke Linden's update following. The report certification required by N.J.A.C. 7:26E-1.5 is included in Attachment A.

1. NJDEP requires a description of each planned remedial action.

- Scheduled to be initiated or completed within the reporting period;***
- Actually initiated or completed during the reporting period; and***
- Scheduled but not initiated or not completed during the reporting period, including the reasons for the noncompliance with the approved schedule.***



Soil

As outlined in the approved RAWP, the remedial activities for soils on the Industrial #2 Redevelopment Area consist of the following:

- a. Excavation of approximately 1,715 yd³ of soil containing chemicals of potential concern (COPCs) at concentrations above applicable standards from AOI-7;
- b. Establishing deed restrictions or environmental covenants to maintain commercial/industrial land use at the Site;
- c. Regrading the site to achieve the grade necessary to support the proposed redevelopment;
- d. Constructing building slabs, parking areas and roadways and placing one foot of clean soil over geotextile fabric in future greenspaces to preclude direct contact exposures to future receptor populations and/or provide cover to historical fill material; and
- e. Surveying to demonstrate that all areas are covered with engineering controls (e.g., building slabs, parking areas and roadways) or one foot of clean soil.

The excavation activities within AOI-7 were completed in March and April 2012. A summary of the excavation activities, confirmatory sampling results, soil disposal and other details were provided in Quarterly Progress Report No. 4, dated June 30, 2012. As discussed in that report, the confirmatory sampling results indicate that the AOI-7 excavation activities successfully removed the petroleum-impacted soils and achieved the cleanup goals specified in the approved RAWP.

The construction activities/engineering controls described in the RAWP have been completed in the Industrial #1 and #2 Redevelopment Areas of the site.

NJDEP issued the soil remediation permits for the Building 12 and Building 13 portion of the Industrial #1 Redevelopment Area on August 9, 2017. The Licensed Site Remediation Professional (LSRP) issued the Response Action Outcome (RAO) for both permits on November 7, 2017.

Building 11, located at 901 Linden Avenue, was turned over to the tenant on June 1, 2016 by Duke Linden, LLC. The tenant made modifications that temporarily affected portions of interior and exterior engineering controls (hardscape surfaces and clean cover greenspace area) during their build-out of the structure. Tenant modifications to the engineering controls (building slab, hardscape surfaces and greenspace areas) were completed in the fourth quarter of 2017 and the Soil RAR and permit application for the Building 11 area (remaining portion of Industrial #1 and all Industrial #2) was submitted to NJDEP on December 19, 2017.

Fill Material Import

No import of fill material occurred during the reporting period.

Groundwater

On August 25, 2015, Duke, Hull and JM Sorge met with the NJDEP Case Manager to discuss establishing Classification Exception Areas (CEA) for the Retail and Industrial portions of the site. The groundwater impacts associated with the disputed groundwater area are associated with off-site sources. Based on the meeting, a groundwater permit and CEA would be established for the overburden groundwater zones over a portion of the Industrial #1 and #2 Development Areas in

the AOI-6 area. Additional quarterly groundwater sampling was conducted to support the monitored natural attenuation remedy.

A Groundwater Remedial Investigation/Remedial Action Report, Groundwater Remedial Action Permit Application, and CEA are in the process of being finalized for submittal to NJDEP that will propose a natural attenuation remedy for the VOC contamination in overburden groundwater in the AOI-6 area. These documents are anticipated to be submitted to NJDEP in March 2018.

No groundwater monitoring occurred on the Industrial #1 or #2 Redevelopment Areas during the current reporting period.

2. ***NJDEP requires discussion of problems and delays in the implementation of the RAWP, which should include proposals for corrections.***

Implementation of the RAWP has been completed. The LSRP has issued RAOs for two of the three building areas on the Industrial Redevelopment Area. The third building area (Building 11 area) occupies a portion of the Industrial #1 and all the Industrial #2 Redevelopment Areas. Tenant modifications to Building 11 and implementation of the Industrial #1 and #2 RAWPs are complete. The Soil RAR for the last remaining Industrial area (Building 11) was submitted to NJDEP on December 19, 2017.

3. ***NJDEP requires proposals for a deviation from, or modification to, the approved RAWP.***

No deviations from, or modifications to, the approved RAWP occurred.

4. ***NJDEP requires submittal of a revised schedule pursuant to N.J.A.C. 7:26E-6.5, to reflect the changes as noted in 1 through 3 above.***

The construction activities/engineering controls described in the RAWPs have been completed in the Industrial #1 and #2 Redevelopment Areas of the site.

5. ***NJDEP requires an updated status of all permit applications relative to the critical path schedule.***

The permits required for initiation of the remedial activities are summarized below.

Permit/Approval Type	Status	Notes
Planning Board Approval	Approved 11/17/08	Site plan approved by City of Linden Planning Board
NPDES Permit (Storm Water)	Approved 9/16/09	NPDES Permit No. 0088323
Soil Conservation District	Approved 9/16/09	Approved by Somerset-Union Conservation District
Building Permit for Building 11	Approved 9/24/15	

6. ***NJDEP requires a listing of each remedial action to be performed during the next reporting period.***

The remedial actions (earthwork, installation of engineering controls (construction of building slabs, pavement sections, etc. and placement of clean cover materials)) outlined in the RAWPs have been completed for the Industrial Redevelopment Area.

7. NJDEP requires costs of each remedial action.

- i. Annual summary of all remedial action costs incurred to date; and*
- ii. Revised cost estimate for remedial actions remaining to be performed.*

The overall cost estimate for completing remedial activities remained consistent with that presented in the RAWP (i.e., approximately \$11,900,000 for earthwork and construction of engineering controls).

8. NJDEP requires a tabulation of sampling results [according to N.J.A.C. 7:26E-3.13(c)(3)] received during the reporting period and a summary of the data and any conclusions, presented in a format consistent with N.J.A.C. 7:26E-4.8.

No sampling occurred during the reporting period.

9. NJDEP requires a summary of active groundwater remedial actions.

- i. Groundwater elevation maps with groundwater flow shown immediately before and during active groundwater remediation;*
- ii. Graphs depicting changes in concentrations over time for all impacted wells as well as all down-gradient wells;*
- iii. Summary of volume of water treated since last reporting period and the total volume treated since active remedial action commenced; and*
- iv. Summary of groundwater contamination, indicating either that contamination remains above applicable standards (include a proposal detailing additional remedial actions) or that concentrations are below applicable standards.*

The RAWP for the Industrial #2 Redevelopment Area was limited to soils only. Therefore, this section is not applicable.

10. NJDEP requires a summary of natural remediation groundwater remedial actions.

- i. Summary table of the groundwater monitoring results collected; and*
- ii. Conclusions whether data indicate that natural remediation is no longer appropriate (must then also submit a revised RAWP).*

The RAWP for the Industrial #1 Redevelopment Area was limited to soils only. As discussed in Item 1, a Groundwater Remedial Investigation/Remedial Action Report, Groundwater Remedial Action Permit Application, and CEA are in the process of being finalized and will be submitted to NJDEQ proposing a natural attenuation remedy for VOC contamination in overburden groundwater within the proposed CEA.

11. NJDEP requires a description of all wastes generated as a result of the remedial action.

- i. Tabulation of waste characterization samples collected, including the physical state of the material, volume, number of samples, analyses performed and results;*
- ii. Listing of types and quantities of waste generated by the remedial action during the reporting period as well as to date;*
- iii. Name of the disposal facility used;*
- iv. Transporters' dates of disposal; and*
- v. Manifest numbers of each waste shipment.*

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No wastes were generated during the reporting period.

12. ***NJDEP requires that any additional support documentation that is available also be provided (photos, etc.).***

The remedial actions outlined in the RAWP were completed and support documentation was provided in previous progress reports. No additional support documentation is available.

The next scheduled remedial action progress report is for the period March 1, 2018 and May 31, 2018. As stated, the construction activities/engineering controls described in the RAWPs have been completed in the Industrial #1 and #2 Redevelopment Areas of the site. The LSRP has issued RAOs for two of the three areas and the soil RAR and permit application for the third remaining area (remainder of Industrial #1 and Industrial #2) was submitted to NJDEP on December 19, 2017.

Duke Linden is requesting approval from NJDEP to terminate submitting future remedial quarterly progress reports for the Industrial #1 and #2 Redevelopment Areas of the site. Please feel free to contact Raymond Kennedy at (614) 793-8777 with any questions regarding the update provided herein.

Sincerely,



Raymond Kennedy
Senior Project Manager

Attachments

cc: Clifford Ng – U.S. EPA Region 2
Dana Tanner – Duke Realty
Joseph M. Sorge – J.M. Sorge, Inc.

ATTACHMENT A

Report Certification

Certification

**Duke Linden, LLC
ISRA Case Number E20040531-Industrial**

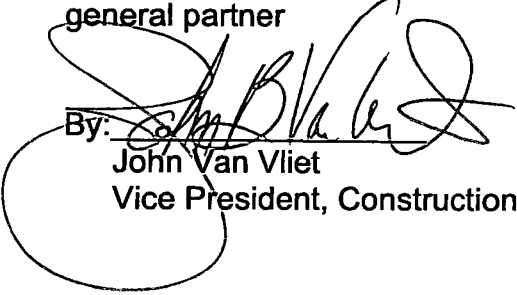
I certify under penalty of law that I have personally examined and am familiar with the information submitted herein and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, to the best of my knowledge, I believe that the submitted information is true, accurate and complete. I am aware that there are significant civil penalties for knowingly submitting false, inaccurate or incomplete information and that I am committing a crime of the fourth degree if I make a written false statement which I do not believe to be true. I am also aware that if I knowingly direct or authorize the violation of any statute, I am personally liable for the penalties.

Duke Linden, LLC, a Delaware limited liability company

By: Duke Realty Limited Partnership, an Indiana limited partnership, its sole member

By: Duke Realty Corporation, an Indiana corporation, sole general partner

Date: March 6, 2018

By: 
John Van Vliet
Vice President, Construction

Sworn to and subscribed to before me on this 6th day of March, 2018

#7758956 Bobb DeWanda
Notary

